

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN
EASTERN DIVISION**

In re Frank R. Jakel and)	Case No. 18-26494-GMH
Maria L. Jakel,)	
)	
Debtors.)	Chapter 13
)	
)	Motion to Continue Automatic Stay
)	
)	
)	

MOTION TO CONTINUE AUTOMATIC STAY

Frank R. Jakel (“Debtor”), through his counsel, Michael J. Watton and the Watton Law Group, hereby moves under 11 U.S.C. § 362(c)(3)(B) that this Court enter an order continuing the automatic stay and in support thereof alleges the following:

1. That Debtor has had one previous case under Title 11 dismissed within 1 year of the filing of this present Chapter 13 bankruptcy;
2. That since the dismissal of the previous bankruptcy, there has been a substantial change in the personal and financial affairs of Debtor in that during the prior case was dismissed for failure to make payments. Debtor was hospitalized in mid-November 2017 for six (6) weeks. Debtor lost his job when he was hospitalized and was unable to find new employment until the end of March 2018. Due to Debtor’s time off from work he fell behind on his rent. In order to avoid eviction

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Debtor had to use all available funds to pay his landlord and was unable to make his bankruptcy payments. In the present case, Debtor is employed and the plan payments are affordable based upon his current budget; and

3. That Debtor declares that this present Chapter 13 bankruptcy will result in a confirmed plan which will be fully performed.

WHEREFORE, Debtor requests that the Court schedule a hearing on this motion within 30 days of the filing of this present Chapter 13 bankruptcy and issue an order continuing the automatic stay as to all creditors.

Date: July 3, 2018

/s/ Kelly E. Klawonn (for)
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